

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA (PHILADELPHIA)**

IN RE: : CHAPTER 13  
:   
REBECCA LIBERTY :   
: PETITION NO.: 19-16253-AMC  
DEBTOR :

**NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY TO PERMIT  
SUMMIT TRACE APARTMENTS, LP TO PROCEED WITH AN EVICTION FOR  
99 SUMMIT TRACE ROAD, LANGHORNE, PA 19047**

Summit Trace Apartments, LP has filed papers with the court seeking relief from the automatic stay to proceed with an eviction for 99 Summit Trace Road, Langhorne, PA 19047.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to permit Summit Trace Apartments, LP to proceed with an eviction for 99 Summit Trace Road, Langhorne, PA 19047 or if you want the court to consider your views on the motion, then **on or before March 30, 2020**, you or your attorney must:

File with the court a written response explaining your position at:

U.S. Bankruptcy Court  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above. You must also mail a copy to:

Jénel R. Marraccini, Esquire  
660 2<sup>nd</sup> Street Pike  
Southampton, PA 18966

William C. Miller (Trustee)  
PO Box 1229  
Philadelphia, PA 19105

Attend the hearing scheduled to be held on April 7, 2020 at 11:00 a.m., in Courtroom 4, United States Bankruptcy Court, Eastern District of Pennsylvania, 900 Market Street, Suite 400, Philadelphia, PA 19107.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Respectfully submitted,

COHEN MARRACCINI, LLC.

BY: /s/ Jénel R. Marraccini  
JÉNEL R. MARRACCINI, ESQUIRE  
Attorney for Movant  
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Southampton, PA 18966  
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